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9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 THOMAS E. PEREZ, United States Secretary
14 of Labor,

Case No.: 14-cv-00667-WHO

15 Plaintiff,

16 v.

17 ANIMAL CLINIC OF ALAMO, INC., a
corporation; DEBORAH KNIBB, an
18 individual; JOHN C. BAINE, III, an
individual; and the ANIMAL CLINIC
19 OF ALAMO PROFIT SHARING
PLAN, an employee pension benefit plan,

**STIPULATION AND ORDER RE:
EXTENSION OF CASE DEADLINES**

20 Defendants.

22 Pursuant to the Court's October 30, 2014 Order Continuing Trial and Other Dates, the
23 discovery cutoff in this case is March 30, 2015. Dkt. No. 50. On February 12, 2015, Magistrate
24 Judge Laurel Beeler set a further settlement conference for March 2, 2015. Dkt. No. 53. In
25 order to provide the parties adequate time to engage in meaningful settlement discussions while
26 preserving their ability to conduct sufficient discovery if they are unable to resolve this matter
27 through the settlement conference process, the parties request and hereby stipulate to extend the
28

1 case deadlines in the Court's October 30, 2014 order by 60 days as follows:

3 Discovery cutoff (fact and expert): May 29, 2015

4 Expert disclosure: April 17, 2015

5 Rebuttal disclosure: May 8, 2015

6 Dispositive motions heard by: July 5, 2015

7 Pretrial Conference: August 28, 2015

8 Trial: September 11, 2015

9 AGREED:

10 M. PATRICIA SMITH
Solicitor of Labor

11 JANET M. HEROLD
Regional Solicitor

12 DANIELLE L. JABERG
Counsel for ERISA

13 IAN H. ELIASOPH
Counsel for ERISA

14 Dated: 2/19/2015

15 By: /s/ Benjamin Botts
16 BENJAMIN R. BOTT
17 Trial Attorney
18 U.S. Department of Labor, Office of the Solicitor
19 Attorneys for Plaintiff Thomas E. Perez

20 Dated: 2/18/2015

21 /s/Robert Guite (as authorized 2/18/2015)
22 ROBERT GUITE
23 Sheppard Mullin, LLP
24 Settlement Attorney for Defendant Deborah Knibb

25 Dated: _____

26 JOHN BAINE III, Defendant in Pro Per

27 Dated: 2/13/2015

28 /s/William Thompson (as authorized 2/13/2015)
WILLIAM THOMPSON
Attorney for Third-Party Defendant David Berlier

ORDER

PURSUANT TO STIPULATION, **modified as follows**, the case schedule shall be:

Discovery cutoff (fact and expert): May 29, 2015

Expert disclosure: April 17, 2015

Rebuttal disclosure: May 8, 2015

Dispositive motions heard by: July 1, 2015

Pretrial Conference: August 24, 2015

Trial: September 21, 2015

IT IS SO ORDERED.

Dated: February 20, 2015

W.H.O
HONORABLE WILLIAM H. ORRICK
United States District Judge